

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Date: July 2, 2024

June 28, 2024

VIA ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

RE: Monterey Bay Military Housing, LLC et. al. v. Ambac Assurance Corp. et al., Case No. 1:19-cv-09193-PGG

Dear Judge Gardephe,

The parties to the above-captioned action write jointly pursuant to the Court's Order dated April 30, 2024 (Dkt. No. 846).

As stipulated in the Court's Order, the parties will exchange reply papers on July 12, 2024. Pursuant to Section IV.C of Your Honor's Individual Rules, the parties are planning to commence the process of e-filing opening, opposition, and reply briefs and supporting materials once the parties' cross-motions have been fully briefed. However, given the volume of the submissions, which to date collectively exceed 2,400 exhibits, the parties anticipate that it will take a number of days to upload all the accompanying materials. The parties also anticipate moving to seal several of the accompanying exhibits pursuant to Section II.B of Your Honor's Individual Rules and will need to file redacted copies of those exhibits and their memorandums and local rule 56.1 statements. Additional time is also warranted to allow the parties time to evaluate the various reply submissions for confidentiality issues, and to coordinate with third parties regarding any potential interest in confidentiality any such third parties may have as to documents to be filed in connection with the parties' cross-motions.

Accordingly, the parties have met and conferred and jointly seek leave to enlarge the filing period for the previously exchanged submissions. The parties intend to comply with the July 12, 2024, deadline to serve reply papers, but seek an extension until July 26, 2024, to complete the upload of all papers and exhibits in the ECF system. To facilitate the Court's review of the parties' cross-motions, each party will hand deliver to the Court courtesy copies of their unredacted motions, accompanying local rule 56.1 statements, and a USB of their exhibits, on Monday, July 15, 2024. Upon filing any motions to seal, the parties will also hand deliver to the Court additional courtesy copies as required.

The parties are available to address any of the foregoing at a telephonic conference at the Court's convenience.

Respectfully submitted,

/s/Lauren Tabaksblat

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